

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA

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EDWARD P. WATKINS, CLERK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA.

Thomas S. Corant

Full name and prison number  
of plaintiff(s)

v.

Lee County Detention

Facility, All staff on

Duty 10-15-2005-10-16

10-17 2005-10-27-2005

Name of person(s) who violated  
your constitutional rights.  
(List the names of all the  
persons.)

CIVIL ACTION NO. 3:05cv1200-T  
(To be supplied by Clerk of  
U.S. District Court)

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court  
dealing with the same or similar facts involved in this  
action? YES ( ) NO (✓)

B. Have you begun other lawsuits in state or federal court  
relating to your imprisonment? YES ( ) NO (✓)

C. If your answer to A or B is yes, describe each lawsuit  
in the space below. (If there is more than one lawsuit,  
describe the additional lawsuits on another piece of  
paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) \_\_\_\_\_

Defendant(s) \_\_\_\_\_

2. Court (if federal court, name the district; if  
state court, name the county) \_\_\_\_\_

3. Docket number \_\_\_\_\_
4. Name of judge to whom case was assigned \_\_\_\_\_
5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) \_\_\_\_\_
6. Approximate date of filing lawsuit \_\_\_\_\_
7. Approximate date of disposition \_\_\_\_\_

II. PLACE OF PRESENT CONFINEMENT Lee County Detention Center

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED Lee County Detention Center

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

NAME	ADDRESS
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1. Scroggins
2. Entire Staff at detention Center
3. Shift on Aug 4 10-15-2005, 10-16-05, 10-17-05
4. Night Shift 10-15-05, 10-16-05, 10-17-05
5. Attending physician (Doctor)
6. \_\_\_\_\_

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED Started on 10-15-2005

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: Guards passed out used & contaminated Razors on said day staff infection set in immediately and worsened with no medical attention for 3 days. have documented incident.

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

10-15-2005 Dirty & contaminated & used razors  
were passed out by scaggs. Infection set  
in immediately I was in serious pain & suffering  
with no medical attention for three days  
my entire face mouth & throat swelled shut.  
 GROUND TWO: where I couldn't even eat for 3 days

SUPPORTING FACTS: I have scars, medical  
records & numerous witness all the inmates  
of F4 at the time of incident and F2  
F6-F3 I am permanently disfigured from  
the incident. Staff infection is common  
in this place

GROUND THREE: Living conditions are substandard  
and uncleared & unmaintained,

SUPPORTING FACTS: Food given is nowhere near  
adequate, Meat is almost never seen on trays  
breakfast, Lunch, or dinner. Breakfast is one spoonful  
of eggs, about 3 spoonful of grit and a hard piece of toast,  
A Bologna or Peanut butter Sandwich for lunch, Beans, rice, and  
or greens for dinner no meat. Water only to drink

I am permanently scared also can not grow  
 facial hair in a large part of my chin. I also  
 have a dimple where the Doctor cut me with  
 no anesthetic and I have no feeling in a large  
 portion of my face and chin because of gross  
 negligence.

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.  
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

\$500,000  
Monetary payment for pain & suffering  
and scarring, and should be evaluated by Federal  
Health authority & officials for evaluation & improper management

Thomas J. Sr. Hardy Pang  
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true  
and correct.

EXECUTED on 10-27-2005  
(Date)

Thomas J. Sr. Hardy Pang  
Signature of plaintiff(s)